

REMARKS

Claims 1-91 are pending in the application. Claims 28, 29, 38-66, 77-80 and 90 have been withdrawn. Claims 6-9, 11, 13-18, 27 and 68-76 have been indicated as being allowable if rewritten in independent form including all of the limitations of the base claims and any intervening claims. Claims 10, 12, 19-21, 85 and 88 have been indicated as being allowable provided they are rewritten to overcome the rejections under 35 U.S.C. §112, second paragraph, and to include all of the limitations of the base claim and any intervening claims. Claims 86 and 87 have been allowed.

Claims 6, 11, 13, 27 and 68-70 have been rewritten in independent form including all the limitations of the base claim and any intervening claims. Claims 7-9 depend from independent claim 6, claims 14-18 depend from independent claim 13 and claims 71-76 depend from independent claim 70. Claims 10, 12, 19-21, 85 and 88 have been rewritten (either the claim itself or its base claim) to overcome the rejections under 35 U.S.C. §112, second paragraph.

Favorable reconsideration of the application is respectfully requested.

***I. REJECTION OF CLAIMS 3-10, 12, 19-21, 36, 83-85, 88 and 89 UNDER
35 USC §112***

Claims 3-10, 12, 19-21, 36, 83-85, 88 and 89 stand rejected under 35 USC §112, second paragraph. Claims 3, 8, 12, 19, 83-85 and 89 have been amended herein to particularly point out and distinctly claim the subject matter which the applicant regards as the invention.

Claims 3 and 4 have been amended from “the event” to “an event”.

Claim 8 has been amended to replace the pronoun “its” with the noun “retaining ring’s”, and claim 36 has been amended to replace the first instance of the pronoun “it” with the noun “first member” and the second instance of the pronoun “it” with the noun “second member”.

Claim 12 has been amended from “the application” to “an application”.

Claim 19 has been amended from “the same” to “the mechanical retainer”.

Claim 83, line 2 has been amended from “low” to “lowering”.

Claim 84, lines 1 and 2 have been amended from "a tool" to "the tool" and "a second holding mechanism" to "the second holding mechanism".

Claim 85, lines 1 and 2 have been amended from "a force" to "the force" and "a second holding mechanism" to "the second holding mechanism".

Claim 88, has been amended from "a second holding" to "the second holding".

Claim 89, lines 6 and 7 have been amended from "a positionable subassembly" to "the positionable subassembly".

Claims 3, 8, 12, 19, 36, 83-86 and 89 are believed to particularly point out and distinctly claim the subject matter which the applicant regards as the invention.

Claims 4-7, 9, 10, 20, 21, 36 and 88 depend directly or indirectly from one of the amended claims 3, 8, 12, 19, 36, 83-85 and 89, and thus also are believed to particularly point out and distinctly claim the subject matter which the applicant regards as the invention.

Accordingly withdrawal of the rejection is respectfully requested.

***II. REJECTION OF CLAIMS 22-25, 30-32, 37, 67, 81-84, 89 AND 91
UNDER 35 USC §102(b)***

a. Claims 22-25

Claims 22-25 stand rejected under 35 USC 102(b) as being anticipated by U.S. Patent No. 4,422,137 to *Watts* (hereinafter *Watts*). Withdrawal of the rejection is respectfully requested for at least the following reasons.

Claim 22 recites a fixture installation and removal tool that includes a base, a rod attachment means integrally formed within the base, and a coupling means extending from the base at an angle to the rod attachment means.

The Examiner contends that *Watts* discloses a coupling means as recited in claim 22 of the present application. Referring to Fig. 2 of *Watts*, the coupling means 22 cited by the Examiner is a magnet. With further reference to Fig. 3 of *Watts*, the magnet 22 is a toroidally shaped magnet and is completely contained within the base 18 and thus does not extend from the base. Nowhere is it shown that the magnet

extends from the confines of the base. *Watts* does not disclose a coupling means extending from the base, as recited in claim 22 of the present application.

Accordingly, withdrawal of the rejection of claim 22 is respectfully requested.

Claims 23-24 depend from claim 22 and therefore can be distinguished from *Watts* for at least the same reasons.

Furthermore, claim 23 recites the fixture installation and removal tool of claim 22, wherein the base is a tee base. *Watts* discloses a base that is circular in shape. *Watts*, however, does not teach or suggest a structure that includes a tee base.

Accordingly, withdrawal of the rejection of claims 23-25 is respectfully requested.

b. Claims 30-32, 37, 67, 81-84, 89, and 91

Claims 30-32, 37, 67, 81-84 and 91 stand rejected under 35 USC 102(b) as being anticipated by U.S. Patent No. 5,478,256 to *Koganemaru et al.* (hereinafter *Koganemaru*). Withdrawal of the rejection is respectfully requested for at least the following reasons.

i. Claims 30-32

Amended claim 30 recites a fixture mounting system that includes a first relatively fixed part having a retention mechanism, a second part, and a tool for temporarily coupling with respect to the second part. The tool facilitates positioning of the second part with respect to the first part. For example, the tool is coupled to the second part, and the tool is used to register the second part with respect to the first part, which may be remotely located, e.g., on a high ceiling or wall. A latch retains the tool and the second part together, and the latch releases in response to positioning of the second part with respect to the first part.

Koganemaru discloses a fire detector having a bayonet coupling and locking mechanism, e.g., the bayonet connecting terminals, which holds or retains a detector unit to a detector base of a smoke alarm. Nowhere, however, does *Koganemaru* disclose a tool for temporarily coupling with respect to a second part, and a latch to retain the tool and second part together.

A *prima facie* case of anticipation requires a single reference that teaches or enables each of the claimed elements (arranged as in the claim) expressly or inherently as interpreted by one of ordinary skill in the art. The Examiner contends that the bayonet connecting terminals 7-9 and 17-19 are equivalent to the tool recited in claim 30 of the present application. As noted above, *Koganemaru* discloses that the bayonet connecting terminals 7-9, 17-19 retain the detector unit to the detector base of the smoke detector.¹ *Koganemaru*, however, does not teach or suggest that the bayonet terminals are a tool for coupling to a second part to position the second part with respect to a first part. In fact, nowhere has it been shown that *Koganemaru* discloses that the bayonet terminals are a tool. Instead, *Koganemaru* discloses that they are a holding mechanism for retaining the detector unit to the detector base. Furthermore, one having ordinary skill in the art would not interpret the bayonet terminals as a tool for positioning the second part with respect to the first part. *Koganemaru* does not teach or suggest a tool for temporarily coupling with respect to the second part to position the second part with respect to and for retention to the first part, as recited in claim 30 of the present application.

Moreover, the Examiner contends, in addition to disclosing the tool, that *Koganemaru* discloses a latch as recited in claim 30 of the present application. Claim 30 also includes a latch to retain the tool and second part together, the latch releasing in response to positioning of the second part with respect to the first part. The spring disclosed in *Koganemaru* is disengaged by inserting a narrow bar or the like through a part of an elongate hole.² Thus, the spring mechanism of *Koganemaru* requires a separate tool to release the mechanism, and thus it does not release in response to positioning a second part with respect to a first part, as recited in amended claim 30.

Accordingly, withdrawal of the rejection of claim 30 is respectfully requested.

Claim 31 recites a latch for a mounting system and related tool that includes a selectively operable retainer to retain a coupled relation of one member and the tool,

¹ See col. 3, Ins. 53-61 of *Koganemaru*

² See col. 4, Ins. 3-9 of *Koganemaru*

and a release responsive to mounting of the one member to facilitate separating the one member from the tool. As the member is mounted to a mount, the selectively operable retainer releases. Thus, once the member is mounted to the mount, the tool immediately can be removed from the member.

As was noted above, the Examiner contends that the spring 3 of *Koganemaru* is equivalent to the latch recited in claim 31 of the present application. The Applicant respectfully disagrees with the Examiner. The spring disclosed in *Koganemaru* requires a separate tool to disengage the spring mechanism and, therefore, *Koganemaru* does not teach or suggest a release responsive to mounting of one member to facilitate separating the one member from the tool, as recited in claim 31 of the present application, and thus the requirements of anticipation have not been met.

Accordingly, withdrawal of the rejection of claim 31 is respectfully requested.

Claim 32 recites a latch mechanism for a mounting system that includes a tool for manipulating one member with respect to a mount. The tool is used to position the member with respect to a mount, e.g., a mount that is remotely mounted on a wall or ceiling. As was noted above, nowhere does *Koganemaru* teach or suggest a tool for manipulating a member with respect to a mount.

Additionally, claim 32 recites a release mechanism to release a selectively operable retainer to facilitate separating the tool and the member in response to mounting one member with respect to the mount. Clearly, the release mechanism releases the tool from the member upon mounting the member to the mount. Again, *Koganemaru* clearly discloses that a separate tool must be used to release the spring 3.³ Thus, *Koganemaru* does not teach or suggest all of the limitations of claim 32, and therefore the requirements of anticipation have not been met.

Accordingly, withdrawal of the rejection of claim 32 is respectfully requested.

³ See col. 4, Ins. 3-9 of *Koganemaru*

ii. Claim 37

The Examiner contends that *Koganemaru* discloses the elements recited in claim 37 of the present application. The Applicant respectfully disagrees with the Examiner for at least the following reasons.

Claim 37 recites a mounting system for an electrical device that includes first and third electrical terminals, which are in a cover and a base, respectively, that generally circumscribe an area surrounding a respective second and fourth electric terminals, which also are in the cover and base, respectively. Thus, since the first and third electrical terminals circumscribe an area, they are continuous terminals without a gap.

As was noted above, *Koganemaru* discloses several bayonet terminals for retaining the detector unit to the detector base. In addition to providing a holding function, the bayonet terminals also provide electrical connections between the detector unit and the detector base. None of the bayonet terminals, however, circumscribe an area surrounding a respective electrical terminal. Instead, the bayonet terminals distinctly are shown as occupying separate areas of the detector unit and the detector base.⁴ Thus, *Koganemaru* does not teach or suggest electrical terminals generally circumscribing an area surrounding respective electrical terminals, as recited in claim 37 of the present applications.

Additionally, claim 37 recites that at least one of the first and third terminals are operable to deform resiliently in response to urging by the other of the first and third terminals as a base and cover are urged together. The bayonet terminals disclosed in *Koganemaru*, on the other hand, do not deform resiliently. As was discussed above, the bayonet terminals, in addition to providing an electrical connection, also provide a holding force to retain the detector unit to the detector base. Bayonet terminals that deform resiliently would not be optimal for providing a holding function, and therefore are contrary to the teachings of *Koganemaru*. Furthermore, nowhere has it been shown that *Koganemaru* teaches or suggests electrical terminals that deform resiliently in

⁴ See, e.g., Figs. 2 and 8 of *Koganemaru*, reference identifiers 7, 8, 9 and 17, 18 and 19

response to urging by the another electrical terminal as a base and cover are urged together, and therefore the requirements of anticipation have not been met.

Accordingly, withdrawal of the rejection of claim 37 is respectfully requested.

iii. Claim 67

The Examiner contends that *Koganemaru* discloses the limitations of claim 67. More specifically, the Examiner equates the bayonet terminals 7, 8, 9, 17, 18, 19 of *Koganemaru* to the multi-retention mechanism of claim 67. The Applicant respectfully disagrees with the Examiner for at least the following reasons.

Claim 67 recites a mounting system that includes a base, a mounting member, and a multi-retention mechanism to hold the base and the mounting member together. The multi-retention mechanism includes at least one mechanical attachment that is selectively operable to release and hold and operates using a positive lock. The multi-retention mechanism also includes a second attachment that is selectively operable to release and hold and operates responsive to a positional relationship. The second attachment, like the mechanical attachment, provides a holding force between a base and a mounting member that tends to keep the mounting member attached to the base. Should one attachment fail, the other attachment will hold the mounting member to the base.⁵

Koganemaru discloses a smoke detector that includes a detector unit and a detector base. The detector unit is coupled to the detector base via bayonet terminals. For example, the detector unit is positioned against the detector base and rotated in a counterclockwise direction with respect to the detector base. As the detector unit is rotated, the bayonet terminals of the detector unit engage corresponding terminals in the detector base, and the bayonet terminals hold the detector unit to the detector base. As the detector unit is rotated into position, a locking mechanism, which includes an engaging portion (e.g., the spring 3) in the detector base and a recess in the detector unit, engages and prevents rotation of the detector unit with respect to the detector base. The locking mechanism, however, does not hold the detector unit to the

⁵ See pg. 36, Ins. 23-26

detector base. Should the bayonet terminals fail to hold the detector unit to the detector base, the locking mechanism will not provide a holding force. In fact, the locking mechanism, as disclosed in *Koganemaru*, actually applies a force to the detector unit that is away from the detector base, i.e., the force tends to urge the detector unit away from the detector base.⁶ Clearly, the locking mechanism does not hold the detector unit to the detector base. The entire holding force between the detector unit and the detector base is provided by the bayonet terminals. *Koganemaru* does not teach or suggest a second attachment that is selectively operable to release and hold and operates responsive to a positional relationship, as recited in claim 67 of the present application.

Accordingly, withdrawal of the rejection of claim 67 is respectfully requested.

iv. Claims 81-84

The Examiner has rejected claims 81-84 as being anticipated by *Koganemaru*. The Applicant respectfully disagrees with the Examiner for at least the following reasons.

Claim 81 recites a method of removing a suspended subassembly that is releasably coupled to a relatively remote secured subassembly. The method includes coupling a tool to the suspended subassembly to release a first holding mechanism, and applying force to the tool to release a second holding mechanism. Clearly, the method includes releasing two separate and distinct holding mechanisms; the first holding mechanism and the second holding mechanism. As was noted above, both holding mechanisms operate in tandem to provide a holding force between the suspended subassembly and the secured subassembly. If one holding mechanism fails, the other holding mechanism retains the suspended subassembly to the secured subassembly. Furthermore, a single tool is coupled to the suspended subassembly to release both holding mechanisms.

As was noted above, *Koganemaru* does not teach or suggest two holding mechanisms to retain the detector unit to the detector base. Instead, *Koganemaru*

⁶ See Fig. 10 and col. 3, ln. 62-col. 4, ln. 2 of *Koganemaru*

discloses that the detector unit is held to the detector base via bayonet terminals. The bayonet terminals engage when the detector unit is registered to the detector base and rotated with respect to the detector base. A locking mechanism engages when the detector unit has been rotated a predetermined amount. The locking mechanism prevents further rotation of the detector unit with respect to the detector base. The locking mechanism, however, does not hold the detector unit to the detector base in the event that the bayonet terminals fail. Therefore, since *Koganemaru* does not teach or suggest two separate holding mechanisms to couple the detector unit to the detector base, *Koganemaru* cannot teach or suggest a method of removing a suspended subassembly from a secured subassembly that includes coupling a tool to release a first holding mechanism, and applying a force to release a second holding mechanism, as recited in claim 81 of the present application.

Accordingly, withdrawal of the rejection of claim 81 is respectfully requested.

Claims 82-84 depend from claim 81 and therefore can be distinguished from *Koganemaru* for at least the same reasons.

Accordingly, withdrawal of the rejection of claims 82-84 is respectfully requested.

v. Claim 89

The Examiner has rejected claim 89 as being anticipated by *Koganemaru*. The Applicant respectfully disagrees with the Examiner for at least the following reasons.

Where a patentee uses the claim preamble to recite structural limitations of his or her claim invention, the courts give effect to that usage. The preamble of claim 89 recites a fixture installation and removal tool for positioning with respect to a relatively fixed subassembly and a positionable subassembly, which has a latching mechanism that is operable to a positional relation between the relatively fixed subassembly and the positionable subassembly. Thus, the preamble recites a latching mechanism between the positionable subassembly and the fixed subassembly. The relevance of this is discussed below.

Claim 89 also recites that the tool includes a manipulator, which can be an elongated rod, for example, and a support member associated with respect to the manipulator, which supports the positionable subassembly. Clearly, the support

member is a separate entity from the positionable subassembly. The support member includes a securement feature retainable by a latching mechanism of the positionable subassembly. The securement feature of the support member couples to the latching mechanism of the positionable subassembly to lock the two components together. The locking of the support member to the positionable subassembly permits positioning the positionable subassembly relative to the secured subassembly without the risk of the positionable subassembly unexpectedly releasing from support member.

The securement feature of the support member and the latching mechanism of the positionable subassembly are a separate and distinct mechanism from the latching mechanism described in the preamble. The preamble mechanism relates to the secured subassembly and the positionable subassembly, while the claim mechanism relates to the support member and the positionable subassembly.

Koganemaru discloses a smoke detector that includes a detector unit that is coupled to a detector base. The detector unit is secured to the detector base via bayonet terminals in the detector unit, which engage corresponding terminals in the detector base as the detector unit is rotated with respect to the detector base. Nowhere has it been shown, however, that *Koganemaru* teaches or suggests the use of an installation and removal tool to couple the detector unit to the detector base. Moreover, *Koganemaru* does not teach or suggest a fixture installation and removal tool that includes a manipulator and a support member associated with respect to the manipulator. Furthermore, *Koganemaru* does not teach or suggest a support member that includes a securement feature retainable by a selectively operable latching mechanism of a positionable subassembly. *Koganemaru* does not teach or suggest all the limitations of claim 89 of the present application and therefore the requirements of anticipation have not been met.

Accordingly, withdrawal of the rejection of claim 89 is respectfully requested.

vi. Claim 91

The Examiner has rejected claim 91 as being anticipated by *Koganemaru*. The Applicant respectfully disagrees with the Examiner for at least the following reasons.

Claim 91 recites a positionable subassembly that includes connection to connect the positionable subassembly to a support tool for temporary support and manipulation of the positionable subassembly. The positionable subassembly also includes a latch for securing the positionable subassembly to a support tool. The latch has an operating mechanism to release in response to a positional relationship with a relatively fixed subassembly.

As was discussed above, *Koganemaru* discloses a smoke detector that includes a detector unit that is coupled to a detector base. The detector unit is secured to the detector base via bayonet terminals in the detector unit, which engage corresponding terminals in the detector base as the detector unit is rotated with respect to the detector base. *Koganemaru* discloses that a spring mechanism is disengaged by inserting a narrow bar or the like through part of an elongate hole of the detector unit. The hole, while accepting the narrow bar, does not provide a connection for a support tool for temporary support and manipulation of the positionable subassembly, as recited in claim 91 of the present application. *Koganemaru* does not discuss how the detector unit is positioned with respect to the detector base, and nowhere has it been shown that *Koganemaru* teaches or suggests a positionable subassembly that includes a connection for coupling to a support tool. Moreover, *Koganemaru* does not teach or suggest a latch for securing the positionable subassembly to a support tool. Thus, *Koganemaru* does not teach or suggest all the limitations of claim 91, and therefore the requirements of anticipation have not been met.

Accordingly, withdrawal of the rejection of claim 91 is respectfully requested.

III. REJECTION OF CLAIMS 1-5, 26 AND 33-36 UNDER 35 USC §103(a)

Claims 1-5, 26 and 33-36 stand rejected under 35 USC §103(a) based on U.S. Patent No. 3,836,766 to *Auerbach*. Withdrawal of the rejection is respectfully requested for at least the following reasons.

Independent claim 1 recites a fixture mounting structure that includes a magnetic device to hold a cover to a base, and a selectively operable mechanical retainer to provide retention of the cover to the base. One function of the magnetic device and the mechanical retainer is to operate in tandem, wherein if one device were to fail then the

other device would continue to hold the cover to the base. Independent claims 33-35 also recite similar language.

Auerbach discloses a light fixture that provides for quick electrical connection, installation and accessibility to a junction box during and after installation. In one embodiment, *Auerbach* discloses a diffuser having key slots circumferentially spaced about a flange. A base, which is mounted to a ceiling, includes a ring having a plurality of button type fasteners each having an enlarged head. The heads of the fasteners are received by the key slots of the diffuser to provide a secure connection between the base and the diffuser.⁷ In another embodiment, *Auerbach* discloses a diffuser assembly that includes a flange having a sheet of magnetic material. A base ring includes a plurality of magnets that magnetically cooperate with the diffuser. As the diffuser is positioned against the base ring, magnetic coupling secures the diffuser to the base ring.⁸

The Examiner states that Fig. 12 of *Auerbach* discloses a magnetic device, which "is used to hold the cover and base together". The Examiner further states that "Fig. 11 of *Auerbach* teaches the use of a selectively operable mechanical retainer (124, 120) to provide retention of the cover to the base". The Examiner concedes, however, that none of the embodiments shown in *Auerbach* teach all the limitations of claims 1 and 33-35 of the present application. However, the Examiner contends that "[i]t would have been obvious to one having ordinary skill in that art at the time the invention was made to have modified the embodiment depicted by Figure 12 to have incorporated the mechanical retainer as illustrated in Figure 11".⁹ The Applicant respectfully disagrees with the Examiner for at least the following reasons.

A *prima facie* case of obviousness requires one or more references that were available to the inventor and that teach a suggestion to combine or modify the

⁷ See Fig. 11, col. 8, Ins. 3-34 of *Auerbach*

⁸ See Fig. 12, col. 8, Ins. 25-41 of *Auerbach*

⁹ See Office Action dated October 8, 2003, bottom of pg. 5 through the top pf pg. 6.

references, the combination or modification of which would appear to be sufficient to have made the claimed invention obvious to one of ordinary skill in the art. It is insufficient to establish obviousness that the separate elements of the invention existed in the prior art, absent some teaching or suggestion, in the prior art, to combine the elements. Failure to provide the necessary suggestion or motivation creates a presumption that the combination of references selected by the Examiner to support the obviousness rejection were based on hindsight.

In the present case, the Applicant respectfully submits that the Examiner has not provided a suggestion or motivation to combine the two embodiments of *Auerbach*. *Auerbach* does not teach or suggest a dual retention mechanism to secure a cover to a base, and nowhere has it been shown that *Auerbach* teaches or suggests combining the embodiment of Fig. 11 with the embodiment of Fig. 12 to arrive at a new embodiment. Thus, the elements of a *prima facie* case of obviousness have not been met.

Accordingly, withdrawal of the rejection of claims 1 and 33-35 is respectfully requested.

Claims 2-5 and 26 depend from claim 1, and therefore can be distinguished from *Auerbach* for at least the same reasons.

Additionally, claim 5 further recites that the selectively operable mechanical retainer comprises a clip and a retention member. The clip is mounted to the cover and the retention member is mounted to the base.

As was noted above, *Auerbach* discloses a light fixture that includes a diffuser having key slots circumferentially spaced about a flange. A base, which is mounted to a ceiling, includes a ring having a plurality of button type fasteners each having an enlarged head. Another embodiment utilizes a legs attached to the base, and a series of slots in the diffuser. As the diffuser is coupled to the base, the legs interface with the slots to hold the diffuser to the base. *Auerbach*, however, does not teach or suggest a selectively operable mechanical retainer that includes a clip and retention member, wherein the clip is mounted in the cover and the retention member is mounted in the base, as recited in claim 5 of the present application.

Accordingly, withdrawal of the rejection of claims 2-5 and 26 is respectfully requested.

Claim 36, which corresponds to the apparatus claim 34, recites a method of coupling plural members. The method includes the steps of placing a first and second member in proximity for a magnetic retainer to hold the first and second members together. Additionally, the method includes using a mechanical retainer to retain the first and second member together.

As was noted above, *Auerbach* does not teach or suggest a dual retention mechanism. Additionally, *Auerbach* does not suggest combining embodiments to arrive at a dual retention mechanism. Thus, the requirements of a *prima facie* case of obviousness have not been met and the rejection of claim 36 is improper.

Accordingly, withdrawal of the rejection of claim 36 is respectfully requested.

IV. ALLOWABLE SUBJECT MATTER

The Examiner has indicated that claims 6-9, 11, 13-18, 27 and 68-76 would be allowable if rewritten in independent form including all of the limitations of the base claim and any intervening claims, and this has been done.

Accordingly, claims 6-9, 11, 13-18, 27 and 68-76 are believed to be allowable and in a condition for allowance.

Claims 10, 12, 19-21, 85 and 88 have been indicated as being allowable if rewritten to overcome the rejections under 35 USC §112, second paragraph, and this has been done.

Accordingly, claims 10, 12, 19-21, 85 and 88 are believed to be allowable and in a condition for allowance.

Claims 86 and 87 have been allowed.

V. CONCLUSION

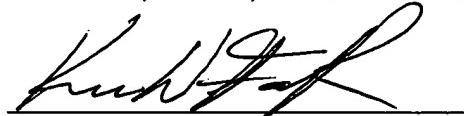
Accordingly, all pending claims are believed to be allowable, and the application is believed to be in condition for allowance. A prompt action to such end is earnestly solicited.

Should the Examiner feel that a telephone interview would be helpful to facilitate favorable prosecution of the above-identified application, the Examiner is invited to contact the undersigned at the telephone number provided below.

Should a petition for an extension of time be necessary for the timely reply to the outstanding Office Action (or if such a petition has been made and an additional extension is necessary), petition is hereby made and the Commissioner is authorized to charge any fees (including additional claim fees) to Deposit Account No. 18-0988.

Respectfully submitted,

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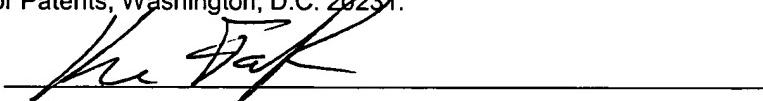
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January 7, 2004

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